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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

RSA 1 Limited Partnership d/b/a Cellular 29 Plus ("Cellular 29"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending September 30, 2001, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Cellular 29 now files this instant report with the Commission.

I. Carrier Background

Cellular 29 provides analog CMRS wireless service in the Iowa 1 - Mills RSA.³ Cellular 29 currently does not offer digital service in the above-referenced markets. As such, Cellular 29 has the ability to route, and will route calls to a TRS provider via the 911 dialing code over its analog network. Cellular 29, however, intends to upgrade its network to provide digital wireless service in the near future, and as such is exploring issues related to providing TTY access to 911 over digital wireless service, including its ability to comply with the implementation deadlines established in the *Fourth Report and Order*. Specifically, Cellular 29 has requested and is evaluating information from potential infrastructure providers to determine their ability to meet the Commission's deadlines.

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Station KNKN649 (CMA412B).

II. Access to E911 Through TTY Devices

The Commission should be aware that presently Cellular 29 owns only the cell site infrastructure serving its market and obtains switching service from a Motorola switch owned and operated by Alltel. Cellular 29 has requested an update from Alltel as to the status of its software implementation deployment and whether or not it is on schedule to meet the Commission's December 31, 2001 deadline. Cellular 29 also requested this information from Motorola. Motorola's response is appended hereto as **Exhibit A**. Cellular 29 is not independently capable of verifying the information presented therein, but has no reason to believe it is not accurate.

Finally, the primary handset providers to Cellular 29 are Motorola and Nokia. Cellular 29 requested that its handset manufacturers provide information on their progress in achieving full compliance with the Commission's rules from the standpoint of providing TTY-compatible digital handsets in sufficient time to allow for testing and compliance with the applicable in-service deadlines. Motorola's response is appended hereto as **Exhibit A**. Cellular 29 is not independently capable of verifying the information presented therein, but has no reason to believe it is not accurate. Cellular 29 has not yet received a response to its query from Nokia, and therefore cannot report on its development activities. In the past, however, Nokia provided this information directly to the Commission in its own quarterly report. Cellular 29 presumes that Nokia will follow the same procedure for this quarter.

The appended Motorola information is respectfully submitted in response to these issues, as required in the Commission's Fourth Report and Order (rel. Dec 14, 2000).

A. Development Activities

- (1) *Network Infrastructure Software Development*
- (2) *Handset Development and Testing Plans*
- (3) *Beta Testing and Lab Testing*
- (4) *Release and General Availability to Carriers of Network Infrastructure Software*
- (5) *Availability to Carriers of Full Acceptance Test Units*
- (6) *Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices*

B. Testing and Deployment Activities

- (7) *Carrier Coordination of Testing With PSAP*
- (8) *Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests*
- (9) *Retail Availability of Necessary Consumer Equipment*
- (10) *Geographic Scope of Network Infrastructure Deployment*

Cellular 29 does not presently offer digital service and therefore has not undertaken any testing and/or deployment on its network as of this date.

Respectfully Submitted,

RSA 1 Limited Partnership d/b/a/
Cellular 29 Plus

October 15, 2001

/s/ Michael K. Kurtis

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It's Attorneys

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EXHIBIT A

MOTOROLA TTY COMPATIBILITY DEVELOPMENT STATUS REPORT 3rd Quarter 2001

Product	Standard	Status	Milestones	Progress
CDMA Handset	IS 127-3 IS 733-2	Integration & System Test	IOT: June 2001 UI: October 2001 ROM: December 2001 SA: 1Q 2002	Planning to participate in November ATIS testing with Sprint.
GSM Handset	TS 26.226 TS 26.230 TR 26.231	Integration & System Test	UI: October 2001 IOT: October 2001 ROM: December 2001 SA: 1Q 2002	Mobile to Mobile calls are functional. Optimization activities are on-going. IOT will start in October.
iDEN Handset		Beta in customer's lab	On plan	
TDMA Handset	IS 823-A IS 840-A	Integration & System Test	IOT: September 2001 UI: September 2001 ROM: October 2001 SA: 1Q 2002	Tested at AWS in Naperville, IL using Lucent Infrastructure. Tested both AMPS and TDMA.
CDMA Infrastructure	IS 127-3 IS 733-2	Ready for FOA	Field Testing: Nov 13-15, 2001	Infrastructure software in field has digital TTY support available now. Only handsets are needed to commence FOA.
iDEN Infrastructure		Beta in customer's lab	On plan	

Note: Motorola works with its carrier customers to provide them specific information related to their respective products.

Note: IOT is Inter Op Testing with RAM based parts for Character Error Rate testing
UI is User Interface testing with HCO / VCO support
ROM is the availability of ROM based phones. These should be functionally identical to a RAM phone.
SA is Ship Acceptance of production volume quantities

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CERTIFICATE OF SERVICE

I, Carol A. Mindzak, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15th day of October 2001, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a diskette copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, on this date, I have served copies of this Report via hand delivery or e-mail to the following:

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